

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554
In the Matter of

Petition for Rule Making of SAVI
Technology, Inc.; Amendment of
Part 15 to Permit Broader Data
Transmission Capabilities

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)
) ET Docket No.01-278
) RM-10051
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To: The Commission

Comments of Brian James Jarchow in response to the
above-captioned Notice of Proposed Rule Making

1. I have been an amateur radio operator for ten years.
2. I share the concerns of the amateur radio community at-large and of the American Radio Relay League ("ARRL") and I join with them in opposing the SAVI Technology, Inc. petition and the proposed addition of Section 15.240 to Part 15 for the reasons that follow.
3. The SAVI Technology, Inc petition contains no mention of the amateur radio allocation of the 433.9 MHz frequency, nor does the petition contain an analysis of the interference potential of their petition.
4. Transmission at 433.9 MHz, at a field strength of 110,000 $\mu\text{V/m}$ and for the durations proposed, originating from numerous mobile devices at unpredictable locations and at unpredictable times, would prevent the legitimate,
licensed weak-signal communications used extensively by Amateur stations in the 425 to 435 MHz band.
5. There is no technical justification for the choice of 433.9 MHz.
6. The mobile locations, coupled with the number of unlicensed transmitters of the type proposed would prevent commission enforcement of prohibited interference to authorized, licensed Amateur transmissions due to the difficulty of tracking and identifying the interfering transimtter(s).
7. As a result of and in consequence of the above, (1) the petition at issue should be denied, (2) the proposed addition of Section 15.240 to Part 15 should not be adopted and (3) such devices should not be allowed to operate between 420 MHz and 450 MHz.

Respectfully submitted,
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